

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	
)	
v.)	CIVIL ACTION NO. W-20-CV-515
)	
REAL PROPERTIES LOCATED AND)	
SITAUTED AT:)	
)	
3534 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (1),)	
)	
2151 OAK HILL DRIVE, COPPERAS)	
COVE, CORYELL COUNTY, TEXAS (2),)	
)	
731 COUNTY ROAD 3372, KEMPNER,)	
LAMPASAS COUNTY, TEXAS (3),)	
)	
5 TRACTS OF LAND ON LAURA)	
DRIVE, KILLEEN, BELL COUNTY,)	
TEXAS (4),)	
)	
3536 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (5),)	
)	
3538 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (6),)	
)	
5007 ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (7),)	
)	
ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (8),)	
)	
4991 ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (9),)	
)	
12117 HIGHWAY 195, KILLEEN,)	
BELL COUNTY, TEXAS (10),)	
)	
2360 EAST STAGECOACH ROAD,)	
KILLEEN, BELL COUNTY, TEXAS (11),)	

3508 PARKMILL DRIVE, KILLEEN,
BELL COUNTY, TEXAS (12),

Respondents.

)
)
)
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)

VERIFIED COMPLAINT FOR FORFEITURE

Comes now Petitioner United States of America, acting by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, pursuant to Rule G, Supplemental Rules of Federal Rules of Civil Procedure, and respectfully states as follows:

I.
NATURE OF THE ACTION

This action is brought by the United States of America seeking forfeiture to the United States of the properties described below as:

Real Properties, with all buildings, appurtenances, and improvements thereon, and any and all surface and sub-surface rights, title, and interests, located and situated at:

1. 3534 Shoreline Drive, Harker Heights, Bell County, Texas, more fully described as:

LOT THIRTY-FIVE (35), BLOCK TEN (10), FINAL PLAT OF THE RIDGE, PHASE THREE, HARKER HEIGHTS, BELL COUNTY, TEXAS, ACCORDING TO THE PLAT OF RECORD IN CABINET D, SLIDES 201-D, 202-A & 202-B, PLAT RECORDS OF BELL COUNTY, TEXAS;

2. 2151 Oak Hill Drive, Copperas Cove, Coryell County, Texas, more fully described as:

FIELD NOTES FOR A TRACT OF LAND IN CORYELL COUNTY, TEXAS PART OF THE WASH. H. DAVIS SURVEY, ABSTRACT NO. 276, THE J.W. HARRIS SURVEY, ABSTRACT NO. 484 AND THE J. FREEMAN SURVEY, ABSTRACT NO. 372, AND THE LAND HEREIN DESCRIBED BEING PART OF THAT CALLED 199.24 ACRE TRACT OF LAND DESCRIBED IN A DEED TO R.C. MANNING, BEING OF RECORD IN VOLUME 250, PAGE 392, DEED RECORDS

OF CORYELL COUNTY, TEXAS.

BEGINNING AT A 3/8" IRON ROD WITH A CAP STAMPED "M & ASSOC. KILLEEN" SET IN THE EAST RIGHT OF WAY OF OAK HILL DRIVE, BEING THE NORTHWEST CORNER OF A CALLED 0.117 ACRE TRACT OF LAND DESCRIBED IN A DEED TO COPPERAS COVE CHRISTIAN CHURCH, BEING OF RECORD IN VOLUME 305, PAGE 5, DEED RECORDS OF CORYELL COUNTY, TEXAS, FOR THE SOUTHWEST CORNER OF THIS.

THENCE WITH THE EAST AND NORTH RIGHT OF WAY OF OAK HILL DRIVE THE FOLLOWING FOUR CALLS:

1. N. 21°09'59" W., 116.82 FEET TO A 1/2" IRON ROD FOUND,
2. N. 56°36'12" W., 167.13 FEET TO A 1-1/4" IRON PIPE FOUND,
3. N. 82°06'18" W., 437.50 FEET TO A 1/2" IRON ROD FOUND, AND
4. S. 85°07'33" W., 99.09 FEET TO A 1" IRON PIPE FOUND, BEING THE SOUTHEAST CORNER OF A CALLED 3.835 ACRE TRACT OF LAND DESCRIBED IN A DEED TO COURTLAND A. MILNER AND WIFE, BEVERLY A. MILNER, BEING OF RECORD IN VOLUME 379, PAGE 58, DEED RECORDS OF CORYELL COUNTY, TEXAS, FOR THE SOUTHWEST CORNER OF THIS.

THENCE N. 01° 33' 37" W., 305.21 FEET WITH THE EAST LINE OF SAID 3.835 ACRE TRACT OF LAND (ADJOINER N. 02° 06' 10" W., 305.62 FEET), TO A 1" IRON PIPE FOUND, BEING THE NORTHEAST CORNER OF SAID 3.835 ACRE TRACT, FOR THE NORTHWEST CORNER OF THIS.

THENCE N. 69° 14' 31" E., 120.77 FEET TO A 3/8" IRON ROD FOUND AND N. 78° 04' 59" E., 344.53 FEET TO A 1" IRON PIPE FOUND, FOR THE NORTHEAST CORNER OF THIS.

THENCE 29° 25' 26" E., 785.14 FEET TO A 1/2" IRON ROD FOUND, BEING A CORNER IN THE WEST LINE OF A CALLED 4.21 ACRE TRACT OF LAND DESCRIBED IN A DEED TO THE CHRISTIAN CHURCH (DISCIPLES OF CHRIST) IN TEXAS, INC., BEING OF RECORD IN VOLUME 300, PAGE 294, DEED RECORDS OF CORYELL COUNTY, TEXAS, AND BEING THE NORTHEAST CORNER OF SAID COPPERAS COVE CHRISTIAN CHURCH TRACT, FOR THE SOUTHEAST OF THIS.

THENCE N 83° 51' 38" W., 114.29 FEET WITH THE NORTH LINE OF SAID 0.117 ACRE TRACT, TO THE PLACE OF BEGINNING ADDITION, FIRST EXTENSION, AN ADDITION TO THE CITY OF COPPERAS COVE, TEXAS, BEING OF RECORD IN VOLUME 2, PAGE 36, DEED RECORDS OF CORYELL COUNTY, TEXAS;

3. **731 County Road 3372, Kempner, Lampasas County, Texas**, more fully described as:

BEING TACT FORTY-TWO (42) OF CHICHA RANCH PHASE TWO, A SUBDIVISION IN LAMPASAS COUNTY, TEXAS, ACCORDING TO THE PLAT OF RECORD IN CABINET 2, SLIDE 23-24, PLAT RECORDS OF LAMPASAS COUNTY, TEXAS, TOGETHER WITH, WITHOUT COVENANT OR WARRANTY EXPRESS OF IMPLIED (WHETHER UNDER SECTION 5.023 OF THE TEXAS PROPERTY CODE OR OTHERWISE) ALL RIGHT, TITLE AND INTEREST, IF ANY, OF GRANTOR AS OWNER OF THE PROPERTY, BUT NOT AS OWNER OF ANY OTHER PROPERTY, IN AND TO, (I) ANY AND ALL APPURTENANCES BELONGING OR APPERTAINING THERETO; (II) ANY AND ALL IMPROVEMENTS LOCATED THEREON; (III) ANY AND ALL APPURTENANT EASEMENTS OR RIGHTS OF WAY AFFECTING SAID REAL PROPERTY AND ANY OF GRANTOR'S RIGHTS TO USE SAME; (IV) ANY AND ALL RIGHTS TO USE SAME; (V) ANY AND ALL MINERAL RIGHTS AND INTERESTS OF GRANTOR'S RELATING TO SAID REAL PROPERTY (PRESENT OR REVERSIONARY); AND (VI) ANY AND ALL RIGHTS TO THE PRESENT OR FUTURE USE OF WASTEWATER, WASTEWATER CAPACITY, DRAINAGE, WATER OR OTHER UTILITY FACILITIES TO THE EXTENT SAME PERTAIN TO OR BENEFIT SAID REAL PROPERTY OR THE IMPROVEMENTS LOCATED THEREON, INCLUDING WITHOUT LIMITATION, ALL RESERVATIONS OF OR COMMITMENTS OR LETTERS COVERING ANY SUCH USE IN THE FUTURE, WHETHER NOW OWNED OR HEREAFTER ACQUIRED; (VII) ANY AND ALL RIGHTS AND INTERESTS OF GRANTOR IN AND TO ANY LEASES COVERING ALL OR ANY PORTION OF SAID REAL PROPERTY; AND (VIII) ALL RIGHT, TITLE, AND INTEREST IN GRANTOR, IF ANY, IN AND TO (A) ANY AND ALL ROADS, STREETS, ALLEYS, AND WAYS (OPEN OR PROPOSED) AFFECTING, CROSSING, FRONTING OR BOUNDING SAID REAL PROPERTY, INCLUDING ANY AWARDS MADE OR TO BE MADE RELATING THERETO INCLUDING, WITHOUT LIMITATION, ANY UNPAID AWARDS OR DAMAGES PAYABLE BY REASON OF DAMAGES THERETO OR BY REASON OF A WIDENING OF OR CHANGING OF THE GRADE WITH RESPECT TO SAME, (B) ANY AND ALL STRIPS, GORES OR PLACES OF PROPERTY ABUTTING, BOUNDING OR WHICH ARE ADJACENT OR CONTIGUOUS TO SAID REAL PROPERTY (WHETHER OWNED OR CLAIMED BY DEED, LIMITATIONS OR OTHERWISE), (C) ANY AND ALL AIR RIGHTS RELATING TO SAID REAL PROPERTY AND (D) ANY AND ALL REVERSIONARY INTERESTS IN AND TO SAID REAL PROPERTY (SAID REAL PROPERTY TOGETHER WITH ANY AND ALL OF THE RELATED IMPROVEMENTS, APPURTENANCES, RIGHTS AND INTERESTS REFERENCED IN ITEMS (I) THROUGH (VIII) ABOVE ARE HEREIN COLLECTIVELY REFERRED TO AS THE "PROPERTY");

4. 5 Tracts of Land on Laura Drive, Killeen, Bell County, Texas, more fully described as:

TRACT ONE: BEING 2.00 ACRES OF LAND OUT OF THE M. T. MARTIN SURVEY, ABSTRACT #963 AND THE W. FREER SURVEY, ABSTRACT #307, BELL COUNTY, TEXAS;

TRACT TWO: BEING 2.00 ACRES OF LAND OUT OF THE M. T. MARTIN SURVEY, ABSTRACT #963, BELL COUNTY, TEXAS;

TRACT THREE: BEING 2.00 ACRES OF LAND OUT OF THE M. T. MARTIN SURVEY, ABSTRACT #963, BELL COUNTY, TEXAS;

TRACT FOUR: BEING 4.00 ACRES OF LAND OUT OF THE M. T. MARTIN SURVEY, ABSTRACT #963, BELL COUNTY, TEXAS;

TRACT FIVE: BEING A TRACT OF LAND OUT OF AND A PART OF THE MOSES T. MARTIN SURVEY, ABSTRACT NO. 933, AND THE LAND HEREIN DESCRIBED BEING A PART OF THAT CERTAIN TRACT DESCRIBED AS 266.5 ACRES IN A DEED FROM W.R. MANNING AND WIFE, ARTIE LEE MANNING, TO CARL D. OGLE, AND WIFE, JUNE L. OGLE, SAID DEED BEING OF RECORD IN VOL. 895, PAGE 592, DEED RECORDS OF BELL COUNTY, TEXAS, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT THAT BEARS S 15° 53' 39" W, 681.11 FEET FROM THE NORTHEAST CORNER OF THE SAID 266.5 ACRE TRACT, AN IRON PIPE FOR THE NORTHEAST CORNER OF THIS.

THENCE N 80° 27' 35" W, 919.20 FEET TO AN IRON PIPE AT A POST FOR THE NORTHWEST CORNER OF THIS.

THENCE S 07° 03' 50" W, 790.97 FEET TO AN IRON PIPE FOR THE SOUTHWEST CORNER OF THIS.

THENCE S 58° 48' 42" E, 821.38 FEET TO AN IRON PIPE IN THE EAST LINE OF THE SAID 266.5 ACTE TRACT FOR THE SOUTHEAST CORNER OF THIS.

THENCE N 15° 53' 39" E, 1099.92 FEET TO THE PLACE OF BEGINNING, CONTAINING 18.34 ACRES OF LAND;

5. 3536 Shoreline Drive, Harker Heights, Bell County, Texas, more fully described as:

LOT THIRTY-FOUR (34), BLOCK TEN (10) FINAL PLAT OF THE RIDGE, PHASE THREE, HARKER HEIGHTS, BELL COUNTY, TEXAS, ACCORDING TO THE PLAT OF RECORD IN CABINET D, SLIDES 201-D, 202-A & 202-B, PLAT RECORDS OF BELL COUNTY, TEXAS;

6. 3538 Shoreline Drive, Harker Heights, Bell County, Texas, more fully described as:

LOT THIRTY-SIX (36), BLOCK TEN (10) FINAL PLAT OF THE RIDGE, PHASE THREE, HARKER HEIGHTS, BELL COUNTY, TEXAS, ACCORDING TO THE PLAT OF RECORD IN CABINET D, SLIDES 201-D, 202-A & 202-B, PLAT RECORDS OF BELL COUNTY, TEXAS;

7. 5007 Onion Road, Killeen, Bell County, Texas, more fully described as:

LOT ONE (1), IN BLOCK ONE (1), IN ECKER ADDITION, IN BELL COUNTY, TEXAS, ACCORDING TO THE PLAT OF RECORD IN CABINET C, SLIDE 347-D, PLAT RECORDS OF BELL COUNTY, TEXAS, TOGETHER WITH, WITHOUT COVENANT OR WARRANTY EXPRESS OR IMPLIED (WHETHER UNDER SECTION 5.023 OF THE TEXAS PROPERTY CODE OR OTHERWISE) ALL RIGHT, TITLE AND INTEREST, IF ANY, OF GRANTOR AS OWNER OF THE PROPERTY, BUT NOT AS OWNER OF ANY OTHER PROPERTY, IN AND TO, (I) ANY AND ALL APPURTENANCES BELONGING OR APPERTAINING THERETO; (II) ANY AND ALL IMPROVEMENTS LOCATED THEREON; (III) ANY AND ALL APPURTENANT EASEMENTS OR RIGHTS OF WAY AFFECTING SAID REAL PROPERTY AND ANY OF GRANTOR'S RIGHTS TO USE SAME; (IV) ANY AND ALL RIGHTS OF INGRESS AND EGRESS TO AND FROM SAID REAL PROPERTY AND ANY OF GRANTOR'S RIGHTS TO USE SAME; (V) ANY AND ALL MINERAL RIGHTS AND INTEREST OF GRANTOR RELATING TO SAID REAL PROPERTY (PRESENT OR REVERSIONARY); AND (VI) ANY AND ALL RIGHTS TO THE PRESENT OR FUTURE USE OF WASTEWATER, WASTEWATER CAPACITY, DRAINAGE, WATER OR OTHER UTILITY FACILITIES TO THE EXTENT SAME PERTAIN TO OR BENEFIT SAID REAL PROPERTY OR THE IMPROVEMENTS LOCATED THEREON, INCLUDING WITHOUT LIMITATION, ALL RESERVATIONS OF OR COMMITMENTS OR LETTERS COVERING ANY SUCH USE IN THE FUTURE, WHETHER NOW OWNED OR HEREAFTER ACQUIRED; (VII) ANY AND ALL RIGHTS AND INTERESTS OF GRANTOR IN AND TO ANY LEASES COVERING ALL OR ANY PORTION OF SAID REAL PROPERTY; AND (VIII) ALL RIGHT, TITLE, AND INTEREST OF GRANTOR, IF ANY, IN AND TO (A) ANY AND ALL ROADS, STREETS, ALLEYS, AND WAYS (OPEN OR PROPOSED) AFFECTING, CROSSING, FRONTING OR BOUNDING SAID REAL

PROPERTY, INCLUDING ANY AWARDS MADE OR TO BE MADE RELATING THERETO INCLUDING, WITHOUT LIMITATION, ANY UNPAID AWARDS OR DAMAGES PAYABLE BY REASON OF DAMAGES THERETO OR BY REASON OF A WIDENING OF OR CHANGING OF THE GRADE WITH RESPECT TO SAME, (B) ANY AND ALL STRIPS, GORES OR PIECES OF PROPERTY ABUTTING, BOUNDING OR WHICH ARE ADJACENT OR CONTIGUOUS TO SAID REAL PROPERTY (WHETHER OWNED OR CLAIMED BY DEED, LIMITATIONS OR OTHERWISE), (C) ANY AND ALL AIR RIGHTS RELATING TO SAID REAL PROPERTY AND (D) ANY AND ALL REVERSIONARY INTERESTS IN AND TO SAID REAL PROPERTY (SAID REAL PROPERTY TOGETHER WITH ANY AND ALL OF THE RELATED IMPROVEMENTS, APPURTENANCES, RIGHTS AND INTERESTS REFERENCED IN ITEMS (I) THROUGH (VIII) ABOVE ARE HEREIN COLLECTIVELY REFERRED TO AS THE "PROPERTY");

8. Onion Road, Killeen, Bell County, Texas, more fully described as:

LOT TWO (2), IN BLOCK ONE (1), IN ECKER ADDITION, IN BELL COUNTY, TEXAS, ACCORDING TO THE PLAT OF RECORD IN CABINET C, SLIDE 347-D, PLAT RECORDS OF BELL COUNTY, TEXAS, TOGETHER WITH, WITHOUT COVENANT OR WARRANTY EXPRESS OR IMPLIED (WHETHER UNDER SECTION 5.023 OF THE TEXAS PROPERTY CODE OR OTHERWISE) ALL RIGHT, TITLE AND INTEREST, IF ANY, OF GRANTOR AS OWNER OF THE PROPERTY, BUT NOT AS OWNER OF ANY OTHER PROPERTY, IN AND TO, (I) ANY AND ALL APPURTENANCES BELONGING OR APPERTAINING THERETO; (II) ANY AND ALL IMPROVEMENTS LOCATED THEREON; (III) ANY AND ALL APPURTENANT EASEMENTS OR RIGHTS OF WAY AFFECTING SAID REAL PROPERTY AND ANY OF GRANTOR'S RIGHTS TO USE SAME; (IV) ANY AND ALL RIGHTS OF INGRESS AND EGRESS TO AND FROM SAID REAL PROPERTY AND ANY OF GRANTOR'S RIGHTS TO USE SAME; (V) ANY AND ALL MINERAL RIGHTS AND INTEREST OF GRANTOR RELATING TO SAID REAL PROPERTY (PRESENT OR REVERSIONARY); AND (VI) ANY AND ALL RIGHTS TO THE PRESENT OR FUTURE USE OF WASTEWATER, WASTEWATER CAPACITY, DRAINAGE, WATER OR OTHER UTILITY FACILITIES TO THE EXTENT SAME PERTAIN TO OR BENEFIT SAID REAL PROPERTY OR THE IMPROVEMENTS LOCATED THEREON, INCLUDING WITHOUT LIMITATION, ALL RESERVATIONS OF OR COMMITMENTS OR LETTERS COVERING ANY SUCH USE IN THE FUTURE, WHETHER NOW OWNED OR HEREAFTER ACQUIRED; (VII) ANY AND ALL RIGHTS AND INTERESTS OF GRANTOR IN AND TO ANY LEASES COVERING ALL OR ANY PORTION OF SAID REAL PROPERTY; AND (VIII) ALL RIGHT, TITLE, AND INTEREST OF GRANTOR, IF ANY, IN AND TO (A) ANY AND ALL ROADS, STREETS, ALLEYS, AND WAYS (OPEN OR

PROPOSED) AFFECTING, CROSSING, FRONTING OR BOUNDING SAID REAL PROPERTY, INCLUDING ANY AWARDS MADE OR TO BE MADE RELATING THERETO INCLUDING, WITHOUT LIMITATION, ANY UNPAID AWARDS OR DAMAGES PAYABLE BY REASON OF DAMAGES THERETO OR BY REASON OF A WIDENING OF OR CHANGING OF THE GRADE WITH RESPECT TO SAME, (B) ANY AND ALL STRIPS, GORES OR PIECES OF PROPERTY ABUTTING, BOUNDING OR WHICH ARE ADJACENT OR CONTIGUOUS TO SAID REAL PROPERTY (WHETHER OWNED OR CLAIMED BY DEED, LIMITATIONS OR OTHERWISE), (C) ANY AND ALL AIR RIGHTS RELATING TO SAID REAL PROPERTY AND (D) ANY AND ALL REVERSIONARY INTERESTS IN AND TO SAID REAL PROPERTY (SAID REAL PROPERTY TOGETHER WITH ANY AND ALL OF THE RELATED IMPROVEMENTS, APPURTENANCES, RIGHTS AND INTERESTS REFERENCED IN ITEMS (I) THROUGH (VIII) ABOVE ARE HEREIN COLLECTIVELY REFERRED TO AS THE "PROPERTY");

9. 4991 Onion Road, Killeen, Bell County, Texas, more fully described as:

BEING PART OF LOT TWENTY-SIX (26), LLEWELYN RANCHETTES, NO. 3, AN UNRECORDED SUBDIVISION IN BELL COUNTY, TEXAS, CONTAINING 2.493 ACRES OF LAND, MORE OR LESS, OUT OF THE ROBERT CUNNINGHAM SURVEY, ABSTRACT NO. 199, BELL COUNTY, TEXAS, AND BEING MORE PARTICULARLY DESCRIBED BY METES AND BOUNDS:

FIELD NOTES FOR A TRACT OF LAND IN BELL COUNTY, TEXAS, PART OF THE ROBERT CUNNINGHAM SURVEY, ABSTRACT NO. 199, AND THE LAND HEREIN DESCRIBED BEING ALL OF THAT CERTAIN 2.494 ACRES TRACT DESCRIBED IN A WARRANTY DEED FROM RICHARD C. CROUCH AND WIFE, ROSEMARY CROUCH TO ORLINO L. TRINIDAD AND WIFE MARIA S. TRINIDAD, DATED JUNE 25, 1987, BEING OF RECORD IN VOLUME 2319, PAGE 179, DEED RECORDS OF BELL COUNTY, TEXAS, SAID TRACT ALSO BEING DESCRIBED AS PART OF LOT 26, LLEWELYN ESTATES, NO. 3, AN UNRECORDED SUBDIVISION IN BELL COUNTY, TEXAS.

BEGINNING AT A 3/8" IRON ROD FOUND IN THE WEST MARGIN OF ONION ROAD (RECORDED IN VOLUME 1068, PAGE 191) BEING THE NORTHEAST CORNER OF SAID 2.494 ACRES TRACT, FOR THE NORTHEAST CORNER OF THIS.

THENCE S. 19°21'00" E., 114.63 FEET WITH THE WEST MARGIN OF ONION ROAD AND THE EAST LINE OF SAID 2.494 ACRES TRACT (S. 19°21'00" E., 114.63 FEET) TO A 3/8" IRON ROD FOUND, BEING THE SOUTHEAST CORNER OF SAID 2.494 ACRES TRACT, FOR THE SOUTHEAST CORNER OF THIS.

THENCE S. 70°38'36" W., 947.11 FEET WITH THE SOUTH LINE OF THE 2.494 ACRES TRACT (S. 70°39'00" W., 947.58 FEET) TO A 3/8" IRON ROD FOUND, BEING THE SOUTHWEST CORNER OF THIS 2.494 ACRES TRACT, FOR THE SOUTHWEST CORNER OF THIS.

THENCE N. 19°39'36" W., 114.63 FEET WITH THE WEST LINE OF THE 2.494 ACRES TRACT (N. 19°33'45" W., 114.63 FEET) TO A 3/8" IRON ROD FOUND, BEING THE NORTHWEST CORNER OF SAID 2.494 ACRES TRACT, FOR THE NORTHWEST CORNER OF THIS.

THENCE N. 70°38'36" E., 947.73 FEET WITH THE NORTH LINE OF THE 2.494 ACRES TRACT (N. 70°30'00" E., 948.00 FEET) TO THE PLACE OF BEGINNING, CONTAINING 2.493 ACRES OF LAND.

THE BEARINGS FOR THE ABOVE DESCRIBED TRACT ARE BASED UPON THE EAST LINE OF THE TRINIDAD 2.494 ACRES TRACT;

10. 12117 Highway 195, Killeen, Bell County, Texas, more fully described as:

FIELD NOTES FOR A TRACT OF LAND IN BELL COUNTY, TEXAS, PART OF THE G.W. ALLISON SURVEY, ABSTRACT NO. 52, AND THE LAND HEREIN DESCRIBED BEING PART OF THAT CERTAIN 80.465 ACRE TRACT OF LAND DESCRIBED IN A DEED FROM RASAMY REALTY COMPANY TO CAMILLA SAFADY RASAMY AND HUSBAND RICHARD RASAMY, BEING OF RECORD IN VOLUME 2591, PAGE 487, DEED RECORDS OF BELL COUNTY, TEXAS.

BEGINNING AT A 3/8" IRON ROD FOUND IN THE WEST RIGHT OF WAY OF STATE HIGHWAY 195, THAT BEARS S. 12°05'00" E., 275.25 FEET FROM THE NORTHEAST CORNER OF SAID 80.465 ACRE TRACT, FOR THE NORTHEAST CORNER OF THIS.

THENCE WITH SAID WEST RIGHT OF WAY, S. 12°05'00" E., 7.69 (DEED BEARING S. 12°05'00" E.) TO A 3/8" IRON ROD FOUND AND S. 12°47'13" E., 173.77 FEET (DEED BEARING S. 12°47'13" E.) TO A 3/8" IRON ROD FOUND, FOR THE SOUTHEAST CORNER OF THIS.

THENCE 70°37'22" W., 2402.15 FEET TO A 3/8" IRON ROD FOUND IN THE WEST LINE OF SAID 80.465 ACRE TRACT AND IN THE EAST LINE OF THE REMAINDER OF A 100 ACRE TRACT OF LAND DESCRIBED IN A DEED TO MRS. M.A. VARDENAN, BEING OF RECORD IN VOLUME 751, PAGE 563, DEED RECORDS OF BELL COUNTY, TEXAS, FOR THE SOUTHWEST CORNER OF THIS;

THENCE WITH SAID WEST LINE, N. 21°54'53" W., 180.43 FEET (DEED BEARING N. 21°54'53" W.) TO A 3/8" IRON ROD FOUND, FOR THE NORTHWEST CORNER OF THIS.

THENCE N. 70°37'22" E., 2431.06 FEET TO THE PLACE OF BEGINNING, CONTAINING 10.00 ACRES OF LAND.

THE BEARINGS FOR THE ABOVE DESCRIPTION ARE BASED ON THE WEST RIGHT OF WAY OF STATE HIGHWAY 195 AS PER DEED OF RECORD IN VOLUME 2591, PAGE 487, DEED RECORDS OF BELL COUNTY, TEXAS;

11. 2360 East Stagecoach Road, Killeen, Bell County, Texas, more fully described as:

LOT NO. SIX (6), BLOCK NO. ONE (1), OF THE LLEWELYN RANCHETTES, A SUBDIVISION IN BELL COUNTY, TEXAS, ACCORDING TO THE PLAT OF SAID SUBDIVISION APPEARING OF RECORD IN VOLUME 2, PAGE 111-D, OF THE PLAT RECORDS OF BELL COUNTY, TEXAS. THIS CONVEYANCE IS MADE SUBJECT TO THE RESTRICTIVE COVENANTS OF SAID SUBDIVISION APPEARING OF RECORD IN VOLUME 905, PAGE 584, OF THE DEED RECORDS OF BELL COUNTY, TEXAS;

12. 3508 Parkmill Drive, Killeen, Bell County, Texas, more fully described as:

BEING LOT NUMBER TWENTY-FIVE (25) IN BLOCK NUMBER SEVEN (7) OF YOWELL RANCH, PHASE THREE, AN ADDITION TO THE CITY OF KILLEEN, BELL COUNTY, TEXAS, ACCORDING TO THE PLAT RECORDED IN CAB D, SLIDES 326-D, 327-A OF THE PLAT RECORDS OF BELL COUNTY, TEXAS,

hereinafter the Respondent Real Properties.

**II.
JURISDICTION AND VENUE**

Under Title 28 U.S.C. § 1345, the Court has jurisdiction over an action commenced by the United States, and under Title 28 U.S.C. § 1355(a), jurisdiction over an action for forfeiture. This Court has *in rem* jurisdiction over the Respondent Real Properties under Title 28 U.S.C. §§ 1355(b) and 1395. Venue is proper in this district pursuant to Title 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this District, and pursuant to

Title 28 U.S.C. § 1355(b)(1)(B) and 1395(b), because the Respondent Real Properties located in this District.

III. STATUTORY BASIS FOR FORFEITURE

This is a civil forfeiture action *in rem* brought against the Respondent Real Properties for violations of Title 18 U.S.C. §§ 371, 641, 1343, and 1956(h) which make the properties subject to forfeiture to the United States pursuant to Title 18 U.S.C. § 981(a)(1)(C), which states (with emphasis added):

§ 981. Civil forfeiture

(a)(1) The following property is subject to forfeiture to the United States:

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting “*specified unlawful activity*” (as defined in section 1956(c)(7) of this title), or a *conspiracy* to commit such offense.

↓

§ 1956. Laundering of monetary instruments

(c) As used in this section—

(7) the term “*specified unlawful activity*” means—

(A) any act or activity constituting an offense listed in section 1961(1) of this title

. . . .

(D) any offense under . . . section 641 (relating to public money, property, or records)

↓

§ 1961. Definitions

As used in this chapter—

(1) “*racketeering activity*” means . . . (B) any act which is indictable under any of the following provisions of title 18, United States Code: . . . section 1343 (relating to wire fraud) . . . section 1956 (relating to the laundering of monetary instruments)

Additionally, Title 18 U.S.C. § 1956 violations are also subject to forfeiture pursuant to Title 18 U.S.C. § 981 (a)(1)(A), which states:

§ 981. Civil forfeiture

(a)(1) The following property is subject to forfeiture to the United States:

(A) Any property, real or personal, involved in a transaction or attempted transaction in violation of section 1956 . . . or any property traceable to such property.

IV.

FACTS IN SUPPORT OF FORFEITURE

See Appendix A for facts under seal.

V.

PRAYER

WHEREFORE, Petitioner, United States of America, prays that due process issue to enforce the forfeiture of the Respondent Real Properties, that due notice pursuant to Rule G(4) be given to all interested parties to appear and show cause why forfeiture should not be decreed,¹ that an order be entered to command the Internal Revenue Service to post the Notice of Complaint for Forfeiture in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., and Title 18 U.S.C. § 985(c)(1)(B), that the Respondent Real Properties be forfeited to the United States, and that the Respondent Real Properties be disposed of in accordance with the law, and for any such further relief as this Honorable Court deems just and proper.

¹Appendix B, which is being filed along with this complaint, will be sent to those known to the United States to have an interest in the Subject Real Properties

Respectfully submitted,

JOHN F. BASH
United States Attorney

By: 

ROBERT ALMONTE II
Assistant United States Attorney
Asset Forfeiture Section
Texas State Bar #24049479
903 San Jacinto Blvd., Suite 334
Austin, Texas 78701
Tel: (512) 916-5858
Fax: (512) 916-5854
robert.almonte2@usdoj.gov

Attorneys for the United States of America

VERIFICATION

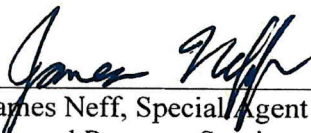
Special Agent Neff declares and says that:

1. I am a Special Agent with the Internal Revenue Service, Criminal Investigation, assigned to the Austin, Texas Office, and am the investigator responsible for the accuracy of the information provided in this litigation.

2. I have read the above Verified Complaint for Forfeiture and know the contents thereof; the information contained in the Verified Complaint for Forfeiture has been furnished by official government sources; and based upon information and belief, the allegations contained in the Verified Complaint for Forfeiture are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10 day of June, 2020.



James Neff, Special Agent
Internal Revenue Service,
Criminal Investigation
Austin, Texas Office

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	
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v.)	CIVIL ACTION NO. W-20-CV-515
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REAL PROPERTIES LOCATED AND)	
SITAUTED AT:)	
)	
3534 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (1),)	
)	
2151 OAK HILL DRIVE, COPPERAS)	
COVE, CORYELL COUNTY, TEXAS (2),)	
)	
731 COUNTY ROAD 3372, KEMPNER,)	
LAMPASAS COUNTY, TEXAS (3),)	
)	
5 TRACTS OF LAND ON LAURA)	
DRIVE, KILLEEN, BELL COUNTY,)	
TEXAS (4),)	
)	
3536 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (5),)	
)	
3538 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (6),)	
)	
5007 ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (7),)	
)	
ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (8),)	
)	
4991 ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (9),)	
)	
12117 HIGHWAY 195, KILLEEN,)	
BELL COUNTY, TEXAS (10),)	
)	
2360 EAST STAGECOACH ROAD,)	
KILLEEN, BELL COUNTY, TEXAS (11),)	

3508 PARKMILL DRIVE, KILLEEN,
BELL COUNTY, TEXAS (12),

Respondents.

**ORDER TO POST NOTICE OF COMPLAINT FOR FORFEITURE OF
RESPONDENT REAL PROPERTIES**

WHEREAS a Verified Complaint for Forfeiture *in rem* was filed on the _____ day of _____, 2020, against the following properties:

Real Properties, with all buildings, appurtenances, and improvements thereon, and any and all surface and sub-surface rights, title, and interests, located and situated at:

1. 3534 Shoreline Drive, Harker Heights, Bell County, Texas;
2. 2151 Oak Hill Drive, Copperas Cove, Coryell County, Texas;
3. 731 County Road 3372, Kempner, Lampasas County, Texas;
4. 5 Tracts of Land on Laura Drive, Killeen, Bell County, Texas;
5. 3536 Shoreline Drive, Harker Heights, Bell County, Texas;
6. 3538 Shoreline Drive, Harker Heights, Bell County, Texas;
7. 5007 Onion Road, Killeen, Bell County, Texas;
8. Onion Road, Killeen, Bell County, Texas;
9. 4991 Onion Road, Killeen, Bell County, Texas;
10. 12117 Highway 195, Killeen, Bell County, Texas;
11. 2360 East Stagecoach Road, Killeen, Bell County, Texas;
12. 3508 Parkmill Drive, Killeen, Bell County, Texas,

hereinafter the Respondent Real Properties, which are also more fully described in the Verified Complaint for Forfeiture, alleging that the Respondent Real Properties are subject to forfeiture to the United States of America pursuant to Title 18 U.S.C. §§ 981(a)(1) (A) & (C) for violations of

Title 18 U.S.C. §§ 371, 641, 1343, and 1956(h); IT IS THEREFORE

ORDERED that the Internal Revenue Service for the Western District of Texas, or other authorized law enforcement officer or any other person or organization authorized by law, be commanded to post the Notice of Complaint for Forfeiture in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., and Title 18 U.S.C. § 985(c)(1)(B), by affixing a copy of the Notice of Complaint for Forfeiture in this action, in a conspicuous place upon the premises and, if applicable, by leaving a copy of the Notice of Complaint for Forfeiture and accompanying documents with the occupant of the premises, if any, until further order of the Court, and to make my return as provided by law and said Order has been executed.

SIGNED this _____ day of _____, 2020.

UNITED STATES DISTRICT JUDGE

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	
)	
v.)	CIVIL ACTION NO. W-20-CV-515
)	
REAL PROPERTIES LOCATED AND)	
SITAUTED AT:)	
)	
3534 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (1),)	
)	
2151 OAK HILL DRIVE, COPPERAS)	
COVE, CORYELL COUNTY, TEXAS (2),)	
)	
731 COUNTY ROAD 3372, KEMPNER,)	
LAMPASAS COUNTY, TEXAS (3),)	
)	
5 TRACTS OF LAND ON LAURA)	
DRIVE, KILLEEN, BELL COUNTY,)	
TEXAS (4),)	
)	
3536 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (5),)	
)	
3538 SHORELINE DRIVE, HARKER)	
HEIGHTS, BELL COUNTY, TEXAS (6),)	
)	
5007 ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (7),)	
)	
ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (8),)	
)	
4991 ONION ROAD, KILLEEN, BELL)	
COUNTY, TEXAS (9),)	
)	
12117 HIGHWAY 195, KILLEEN,)	
BELL COUNTY, TEXAS (10),)	
)	
2360 EAST STAGECOACH ROAD,)	
KILLEEN, BELL COUNTY, TEXAS (11),)	

APPENDIX B

3508 PARKMILL DRIVE, KILLEEN,
BELL COUNTY, TEXAS (12),

Respondents.

NOTICE OF COMPLAINT FOR FORFEITURE

1. On the _____ day of _____, 2020, a Verified Complaint for Forfeiture *in rem* was filed in this Court by the United States Attorney for the Western District of Texas and Assistant United States Attorney Robert Almonte II, against the properties described below, which are also more fully described in the Verified Complaint for Forfeiture, for violations of Title 18 U.S.C. §§ 371, 641, 1343, and 1956(h), and which are subject to forfeiture to the United States of America pursuant to Title 18 U.S.C. §§ 981(a)(1)(A) & (C), namely:

Real Properties, with all buildings, appurtenances, and improvements thereon, and any and all surface and sub-surface rights, title, and interests, located and situated at:

1. 3534 Shoreline Drive, Harker Heights, Bell County, Texas;
2. 2151 Oak Hill Drive, Copperas Cove, Coryell County, Texas;
3. 731 County Road 3372, Kempner, Lampasas County, Texas;
4. 5 Tracts of Land on Laura Drive, Killeen, Bell County, Texas;
5. 3536 Shoreline Drive, Harker Heights, Bell County, Texas;
6. 3538 Shoreline Drive, Harker Heights, Bell County, Texas;
7. 5007 Onion Road, Killeen, Bell County, Texas;
8. Onion Road, Killeen, Bell County, Texas;
9. 4991 Onion Road, Killeen, Bell County, Texas;
10. 12117 Highway 195, Killeen, Bell County, Texas;
11. 2360 East Stagecoach Road, Killeen, Bell County, Texas;

12. 3508 Parkmill Drive, Killeen, Bell County, Texas,

hereinafter the Respondent Real Properties.

2. Pursuant to Supplemental Rule G(4)(b), notice to any person who reasonably appears to be a potential claimant shall be by direct notice. Accompanying this notice is the Verified Complaint for Forfeiture which has been filed in this cause and which describes the Respondent Real Properties. Pursuant to Supplemental Rule G(4)(b), any person claiming an interest in the Respondent Real Properties who has received direct notice of this forfeiture action must file a Claim, in compliance with Rule G(5)(a), with the court within **thirty-five (35) days after the notice was sent, if delivered by mail (if mailed, the date sent is provided below), or within 35 days of the date of delivery, if notice was personally served.** An Answer or motion under Rule 12 of the Federal Rules of Civil Procedure must then be filed within **twenty-one (21)** days of the Claim being filed.

The Claim and Answer must be filed with the Clerk of the Court, 800 Franklin Ave., Room 380, Waco, Texas 76701, and copies of each must be served upon Assistant United States Attorney Robert Almonte II, 903 San Jacinto Blvd., Suite 334, Austin, Texas 78701, or default and forfeiture will be ordered. *See* Title 18 U.S.C. § 983(a)(4)(A) and Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claim and Asset Forfeiture Actions.

Failure to follow the requirements set forth above will result in a judgment by default taken against you for the relief demanded in the complaint.

DATE NOTICE MAILED: _____

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Robert Almonte II, U.S. Attorney's Office
903 San Jacinto Blvd., Suite 334, Austin, Texas 78701
(512) 916-5858

DEFENDANTS

Real Properties Located and Situated at:
3534 Shoreline Drive, Harker Heights, Bell County, Texas,
et al

County of Residence of First Listed Defendant Bell
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input checked="" type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title 18 U.S.C. §§ 981 (a)(1)(A) & (C)

Brief description of cause:

Civil Forfeiture

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

6-10-20

SIGNATURE OF ATTORNEY OF RECORD

Robert Almonte II

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE